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Hon. Alvin K. Hellerstein
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

June 27, 2006

*It would not be appropriate
for the court to intervene,
and I decline to do so.
6.29.06*

Re: United States v. Nelly Agudelo, 05 Cr. 708 (AKH)

Dear Judge Hellerstein:

I am the attorney for Nelly Agudelo, a defendant in the above-captioned matter and I write this letter to request the Court's assistance in her ongoing representation. I have a small practice in which I have, and continue to employ, a paralegal named Natalia Berrino. She is a foreign born and trained attorney. She is currently licensed to practice law in Argentina and is studying English in order to sit for our bar examination. (See credentials annexed hereto as Exhibit "A")

Ms. Berrino has been associated with my office for approximately five years and part of her duties include visiting with my clients at the Metropolitan Correctional Center and the Metropolitan Detention Center. Up until approximately eleven months ago there was no problem with Ms. Berrino's fulfilling her duties.

Unfortunately, at that time the MCC realized that she did not have a current letter of good standing and asked her to obtain the same from her consulate, which she did. (See letter annexed hereto as Exhibit "B") I remitted the letter to the MCC and MDC only to have Les Owens of the Legal Department at the MCC tell me cryptically that Ms. Berrino was the subject of some nebulous State Department investigation and I would have to wait for her approval. (See cover letter and letter from consulate annexed hereto as Exhibit "C") It has been eleven months and despite many phone calls to Mr. Owens, no light has been shed on the situation.

CARDENAS + ASSOCIATES

Page 2 of 2

JUNE 27, 2006

As your Honor is fully aware, I have a few cases which demand that I travel abroad. I employ Ms. Berrino, in part, to assist me by visiting my clients in my absences. She is invaluable in examining the evidence with the clients and thereafter assisting me in all facets of case preparation. She is truly an integral part of my practice. At this point, her inability to enter is affecting my ability to appropriately represent my clients.

I respectfully request that your Honor please assist me in determining what course of action would be appropriate at this time. If it is true that Ms. Berrino is the subject of an investigation then I ask that both she, and I, be advised so we may act accordingly.

Otherwise, I would respectfully request that this Court order the MCC and MDC to permit the reentry of Ms. Berrino obviously subject to her fulfilling what ever requirements they may have for such access to the facilities. Thank you.

Respectfully,



J. Roberto Cardenas

JRC/gmp

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